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*Counsel for State Defendants*

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IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

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RUSSELL G. GREER and TRICIA  
CHRISTIE,

Plaintiffs,

v.

GARY R. HERBERT, in his official capacity as Governor of the State of Utah; SEAN D. REYES, in his official capacity as Attorney General of the State of Utah; SIM S. GILL, in his official capacity as District Attorney of the City and County of Salt Lake; JACKIE BISKUPSKI, in her official capacity as Mayor of the City of Salt Lake; BEN McADAMS, in his official capacity as Mayor of the County of Salt Lake; KATHY BERG, in her official capacity as Director of the Division of Commerce; JAMES ALLRED, in his official capacity as Business Licensing Manager for the City of Salt Lake; ROLEN YOSHINAGA, in his official capacity as Director of Planning and Development for the County of Salt Lake,

Defendants.

**STATE DEFENDANTS' MOTION FOR  
EXTENSION OF TIME TO RESPOND TO  
PLAINTIFF'S COMPLAINT**

Case No. 2:16-cv-01067-DBP

Magistrate Judge Dustin B. Pead

Defendants Governor Gary R. Herbert, Attorney General Sean D. Reyes, and Kathy Berg, Division Director of the Division of Corporations and Commercial Code (“State Defendants”), by and through their undersigned counsel, and pursuant to DUCivR. 77-2(a)(2) hereby petition the Clerk of the Court to grant a fourteen (14) day extension of time for State Defendants to file a response to Plaintiff’s Complaint. The time for filing State Defendants’ response to Plaintiff’s Complaint has not expired. No previous extension(s) of time have been requested by State Defendants.

Accordingly, State Defendants respectfully request the Clerk of the Court grant a fourteen day extension of time pursuant to DUCivR 77-2(a)(2). If the Court Clerk grants the requested extension, the State Defendants’ response to Plaintiff’s Complaint will be due on or before December 27, 2016.

WHEREFORE, for the reasons stated herein, State Defendants respectfully request the Court Clerk enter an Order extending the time for State Defendants to respond to Plaintiff’s Complaint until December 27, 2016. A proposed order granting the State Defendants’ Motion for Extension of Time to Respond to Plaintiff’s Complaint is attached hereto as Exhibit A.

DATED: December 1, 2016.

OFFICE OF THE UTAH ATTORNEY GENERAL

/s/ David N. Wolf \_\_\_\_\_  
DAVID N. WOLF  
GREG SODERBERG  
Assistant Utah Attorneys General  
*Counsel for State Defendants*

**CERTIFICATE OF SERVICE**

I certify that on December 1, 2016, a true and correct copy of the foregoing **STATE DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT** was mailed via First Class Mail and by email to the following:

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/s/ Valerie Valencia